

REMARKS/ARGUMENTS

This Amendment is in response to the Office Action mailed October 1, 2003. In the Office Action, claims 5-18, 20, 22 and 23 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,191,360 issued to Tao, et al. (Tao) in combination with U.S. Patent No. 6,306,680 issued to Fillion. Based on the amendments set forth above, Applicants respectfully disagree with the rejection and contend that a *prima facie* case of obviousness cannot be established.

In particular, neither Tao nor Fillion, alone or in combination, describe or even suggest the application of encapsulant after curing of the thermal epoxy. The encapsulant differs in composition from the thermal epoxy as set forth in independent claims 5 and 9. Moreover, as set forth in claim 5, the thermal epoxy is applied to a top surface of the integrated circuit and a thermal element that is placed adjacent to the thermal epoxy. As for claims 9 and 22, the thermal epoxy is placed on the thermal element, which is placed onto a top surface of the integrated circuit. This is in contrast to the teachings of Fillion, which describes the epoxy being "molded around device 102 and thermally cured (or cured with another process such as UV light cure or microwave cure) to form a protective structure for the resilient device package 100." *See column 4, lines 63-67 of the '680 Patent*. The epoxy is not situated on the top surface of the integrated circuit as set forth in these claims. Hence, withdrawal of the §103(a) rejection is warranted.

In addition, as set forth in claim 22, the substrate along with the integrated circuit package, the thermal element and the thermal epoxy are baked prior to curing of the thermal epoxy by radiating energy at a microwave frequency. Neither of the cited references nor the combination of these references describes nor suggests the baking operations to occur *prior* to curing of the thermal epoxy. It is desirable to bake the substrate before curing the thermal epoxy to ensure that the curing process does not release water from the substrate material. *See Page 7, lines 5-8 of the Specification*. This is merely an additional example that the §103(a) rejection is not warranted for claim 22 and should be withdrawn.

With respect to claims 19 and 21, these claims have been rejected under 35 U.S.C. §103(a) as being unpatentable over Tao and Fillion in combination with Agen (62-36091). Agen

does not describe or even suggest baking of the substrate as set forth in claim 22 as well as claims 19 and 21 where the baking is performed *prior to curing of the thermal epoxy* as claimed. *Emphasis added.* Therefore, Applicants respectfully request that the §103 rejections of claims 19 and 21 be withdrawn.

Conclusion

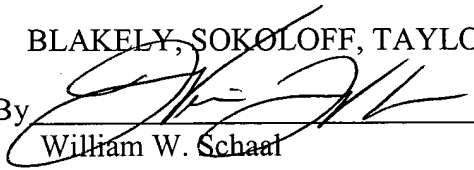
Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Dated: 12/01/2003

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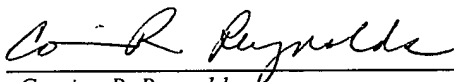
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